

Daniel S. Szalkiewicz, Esq. (DS2323)
DANIEL SZALKIEWICZ & ASSOCIATES, P.C.
23 WEST 73RD STREET
SUITE 102
NEW YORK, NEW YORK 10023
Attorneys for the Plaintiff

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA**

JANE DOE,

Plaintiff,

v.

RICARDO MUNGUIA,

Defendant.

Case Action No. 24-cv-394-SH

DECLARATION

I, Jane Doe, being of full age, hereby declare:

1. I am the Plaintiff in the above-captioned case. I submit this Declaration in support of my request that this Court enter a default judgment against Defendant and set this matter down for an inquest.

2. I request the Court enter a default judgment against Defendant Ricardo Munguia ("Defendant").

3. I have never met Ricardo Munguia. I would not recognize him on the street, and I have never spoken with him. I had never even heard his name before a subpoena response was returned to my attorneys showing that was the one who found me on Pinterest, created an anonymous Pinterest account using my naked image, and then messaged and friended me on the social media site.

4. Defendant did not just view my image, he took affirmative steps to share it and – more disturbingly – to find me online and try to connect and communicate with me.

5. To my knowledge, my full name has never been linked to my images online. Given this fact, it is likely Defendant used facial recognition software or pored over unknown numbers of women with my name who work in my profession to determine my true identity. After that, he took the extra effort of finding my account on Pinterest, creating an account using a fake name and burner e-mail, uploading my image onto that account, and attempting to communicate with me there.

6. I often think about what he would have said to me had I engaged with him, however I did not. I was too horrified to see my naked body on a webpage.

7. The amount of work that must have gone into this is as unsettling as it is humiliating.

8. Worse yet, Defendant's method of harassment resulted in my image being disseminated even further as he used my naked image on his publicly viewable Pinterest account.

9. I am fully identifiable in the photo. It shows my face as well as my breasts.

10. I have never said a single word to Defendant and certainly never provided him with permission to share this image online or taunt me with it.

11. Defendant obviously went to great lengths to identify me and, accordingly, understood that I am a licensed, working professional and, as such, would not have consented to having my naked body plastered all over the internet. Despite that, he posted my image online and attempted to contact me for no legitimate reason.

12. I am requesting that the Court grant me statutory damages plus that Defendant be required to pay my attorney fees and the costs of this case and enjoined from ever sharing my images again.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 8, 2024

/s/ Jane Doe
Jane Doe